



**Arizona Department of Education
Health and Nutrition Services Division**

Administrative Review Summary Report

School Food Authority Name: Tonalea Day School

CTD: 03-40-01

Site: Tonalea Day School

Contacts: Dr. Edie Morris, Education Program Administrator; Ms. Cheryl Kaye, School Principal

Review Date: October 17, 2019

Review Period: September 2019

Programs Reviewed: ☒ National School Lunch ☒ School Breakfast ☐ Afterschool Snack
☐ Fresh Fruit & Vegetable ☐ Special Milk ☐ At-Risk Afterschool Meals

No.	Review Observations & Findings	Technical Assistance Provided	Required Corrective Action
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Performance Standard 1: Certification & Benefit Issuance- Critical Area

No findings.

Performance Standard 1: Meal Counting & Claiming- Critical Area

Breakfast meal count totals on one day during the month of review were not correctly recorded. Specifically on September 12, 2019 the manual count sheets indicated 135 breakfast meals were served, however the daily edit check noted 138 meals were served that day. As a result, the SFA over-claimed by 3 breakfasts on the September 2019 claim for reimbursement. This was deemed a non-systemic error and contributed toward fiscal action calculations.	Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue.	<i>Please provide a written description of changes to the system that have been implemented to ensure that meal service lines provide an accurate count by eligibility category.</i>
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Performance Standard 2: Meal Components & Quantities- Critical Area

No findings.

Performance Standard 2: Dietary Specifications & Nutrient Analysis- Critical Area

No findings.

Meal Access & Reimbursement: Certification & Benefit Issuance

No findings.

Meal Access & Reimbursement: Verification

No findings.

Meal Access & Reimbursement: Meal Counting & Claiming

	Daily edit checks are not being conducted appropriately. Specifically, the attendance factor on the daily edit check does not match the attendance factor on the monthly reimbursement claims.	Discussed how to complete daily edit checks using ADE's Daily Edit Check worksheet. The Daily Edit Check Worksheet can be found on ADE's website at http://www.azed.gov/hns/nslp/forms/ . The Step by Step Instruction: How to Complete Daily Edit Checks can be found on ADE's website at http://www.azed.gov/hns/nslp/trainingps/online/ .	<i>Please provide a completed daily edit check worksheet for the month of October which reflects the correct attendance factor shown on the monthly reimbursement claims. Additionally, the certificate of completion of Step by Step Instruction: How to Complete Daily Edit Checks must be submitted.</i>
2	The site application in CNPWeb does not accurately reflect which meal programs the SFA is operating. Specifically, the site application indicated the SFA was operating ASP during the review period and the month of the on-site visit, however the SFA was not operating ASP during that time.	Referred them to update site application in CNPWeb and contact their assigned specialist to let them know of the changes.	<i>The SFA submitted a new site application in CNPWeb that accurately reflected the programs the SFA is currently operating. No additional corrective action necessary.</i>

Meal Pattern & Nutritional Quality: Offer Versus Serve

Not applicable.

Meal Pattern & Nutritional Quality: Meal Components & Quantities

4	Signage which explains what constitutes a reimbursable meal was not displayed to students at breakfast or lunch.	Discussed feasible options for signage and potential content, plan for creating and posting. Printable POS Signage can be found on ADE's website at http://www.azed.gov/hns/nslp/mealpattern/ .	<i>Please provide the sign that will be displayed to students that demonstrates what constitutes a reimbursable meal at breakfast and lunch. Additionally, please provide written assurance that this sign will be displayed for all students to see.</i>
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Resource Management

5	Meals served to teachers, administrators, custodians, and other adults were not priced so that the adult payment in combination with any per-lunch revenues from other sources designated specifically for the support of adult meals (such as State or local fringe benefit or payroll funds, or funding from voluntary agencies) was sufficient to cover the overall cost of the meal. Specifically, the lunch adult meal price was \$3.50 and should be at least \$3.75.	Discussed ways to determine adult meal prices which included a per meal cost analysis or pricing adult meals to reflect the amount of reimbursement received for a free meal plus the per meal value of entitlement and bonus commodities for non-pricing programs.	<i>Please provide a written description of the steps which have been taken to increase adult meal prices and resolve the discrepancy, including the exact formula used to price adult meals. Additionally, please submit supporting documentation which reflects that prices have been increased to the appropriate level.</i>
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General Program Compliance: Civil Rights

Procedures for receiving and processing complaints alleging discrimination within the school meal programs are not in place.

Discussed site-specific procedures for receiving and processing complaints, as well as identifying the outside agency to which complaints are forwarded (i.e., ADE, Food & Nutrition Services Southwest Regional Office, FNS Office of Civil Rights, or USDA Office of Civil Rights). The SFA's procedures must note whether an allegation is made verbally or in person. The SFA staff member receiving the allegation must transcribe the complaint. The SFA's procedures for receiving a complaint cannot prevent a complaint from being accepted. Additionally, the SFA's procedures must not indicate that they attempt to resolve the complaint themselves nor can the SFA's complaint process be a prerequisite for accepting a complaint. Additional guidance can be found on ADE's website at:
<http://www.azed.gov/hns/civilrights/>.
The Step by Step Instruction: How to File a Civil Rights Complaint can be found on ADE's website at
<http://www.azed.gov/hns/nsfp/trainingps/online/>.

Please provide a written description of the process and procedures for processing complaints alleging discrimination within FNS School Meal Programs. Additionally, the certificate of completion of Step by Step Instruction: How to File a Civil Rights Complaint must be submitted.

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General Program Compliance: SFA On-Site Monitoring

Not applicable.

General Program Compliance: Local Wellness Policy

A recent assessment of the implementation of the LWP has not been conducted nor have plans been developed to complete the assessment.

Discussed requirement to complete an assessment once every three years, at a minimum. The assessment must measure how the LEA is complying with their LWP, how the LEA's LWP compares to the model wellness policy, and progress made in attaining the goals of the wellness policy. Sample evaluation tools can be found on ADE's website at <http://www.azed.gov/hns/nsfp/lwp/>. Also discussed feasible means for notifying the public of the results of the most recent assessment.

None required at this time.

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The public was not notified of the results of the most recent assessment of the implementation of the LWP.

Discussed requirement to make the most recent assessment available to the public. Also discussed feasible means for notifying the public of the results of the most recent assessment on the implementation of the LWP. The USDA's Local Wellness Policy Outreach Toolkit can be found at <https://www.fns.usda.gov/tn/local-school-wellness-policy-outreach-toolkit>.

None required at this time.

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General Program Compliance: Competitive Food Services

No findings.

General Program Compliance: Professional Standards

The School Nutrition Program Director did not meet the training requirements for the current school year and sufficient plans for meeting the requirements have not been developed.

Discussed 12 hour requirement and feasibility for attending upcoming applicable trainings. Trainings for School Nutrition Professionals can be found on ADE's website at <http://www.azed.gov/hns/nslp/training/>. The Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors can be found on ADE's website at <http://www.azed.gov/hns/nslp/trainingps/online/>.

Please provide a completed training tracker for the Director that includes the expected date that the training requirement will be met as well as the name, date and content information of trainings that the School Nutrition Program Director is registered for or has already completed.

9

Full-time School Nutrition Program staff have not met the training requirements for the current school year and sufficient plans for meeting the requirements have not been developed.

Discussed 6 hour training requirement and feasibility for attending upcoming applicable trainings. Trainings for School Nutrition Professionals can be found on ADE's website at <http://www.azed.gov/hns/nslp/training/>. The Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors can be found on ADE's website at <http://www.azed.gov/hns/nslp/trainingps/online/>.

Please provide a completed training tracker for the full-time staff that includes the expected date that the training requirement will be met as well as the name, date and content information of trainings that the School Nutrition Program full-time staff is registered for or has already completed.

10

Part-time School Nutrition Program staff have not met the training requirements for the current school year and sufficient plans for meeting the requirements have not been developed.

Discussed 4 hour training requirement and feasibility for attending upcoming applicable trainings. Trainings for School Nutrition Professionals can be found on ADE's website at <http://www.azed.gov/hns/nslp/training/>. The Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors can be found on ADE's website at <http://www.azed.gov/hns/nslp/trainingps/online/>.

Please provide a completed training tracker for the part-time staff that includes the expected date that the training requirement will be met as well as the name, date and content information of trainings that the School Nutrition Program part-time staff is registered for or has already completed.

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<p>Employees outside of the School Nutrition Program whose responsibilities assist in the operation of the NSLP/SBP have not received applicable training. Specifically, the individual acting as back-up for the point of sale has not received applicable training on meal counting and claiming.</p>	<p>Discussed 4 hour training requirement, employees' job duties and applicable trainings that could be provided and feasible timeline. Trainings for School Nutrition Professionals can be found on ADE's website at http://www.azed.gov/hns/nslp/training/. The Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors can be found on ADE's website at http://www.azed.gov/hns/nslp/trainingps/online/.</p>	<p><i>Please provide a completed training tracker for the non-program staff that includes the expected date that the training requirement will be met as well as the name, date and content information of trainings that the non-program staff is registered for or has already completed.</i></p>
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<p>12</p> <p>Professional Standards training hours are not being adequately tracked.</p>	<p>Referred to ADE's Training Tracking forms found on ADE's website at http://www.azed.gov/hns/nslp/trainingps/. The Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors can be found on ADE's website at http://www.azed.gov/hns/nslp/trainingps/online/.</p>	<p><i>Please provide the tracker that will be used to track Professional Standards training hours on an annual basis for all School Nutrition Program staff. Additionally, please provide written assurance that Professional Standards training hours will be tracked for all School Nutrition Program staff on an annual basis. Additionally, the certificate of completion of Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors must be provided.</i></p>
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General Program Compliance: Water

No findings.

General Program Compliance: Food Safety, Storage and Buy American

<p>The following reviewed products indicated violations of the Buy American Provision in 7CFR 210.21(d) on-site at reviewed schools: bananas (Guatemala) and canned pineapple (Indonesia). Additionally, documentation justifying a Buy American exception was not maintained/on file.</p>	<p>Discussed the Buy American provision requirements and procedures to ensure compliance. Referred to SP38-2017, Buy American Webinar and FAQ. Funds used from the non-profit food service account must be used to procure food products that comply with the Buy American Provision. Additional information on the requirements of this provision, including ADE's prototype Buy American exception document, can be found on ADE's website at http://www.azed.gov/hns/nslp/forms/. Buy American Recorded Webinar and FAQ can be found on ADE's website at http://www.azed.gov/hns/sfp/</p>	<p><i>Please provide a written description of the changes that have been made to procurement and/or recordkeeping procedures to ensure that the requirements of the Buy American Provision are met.</i></p>
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General Program Compliance: Reporting & Recordkeeping

No findings.

General Program Compliance: School Breakfast Program & Summer Food Service Program Outreach

No findings.

Other Federal Program Reviews: Afterschool Snack Program

Not applicable.

Other Federal Program Reviews: Seamless Summer Option

Will be reviewed in Summer 2020 if applicable.

Other Federal Program Reviews: Fresh Fruit & Vegetable Program

Not applicable.

Other Federal Program Reviews: Special Milk Program

Not applicable.

Other Federal Program Reviews: At-Risk Afterschool Meals

Not applicable.

Comments/Recommendations:

Congratulations on the completion of the SY19/20 Administrative Review. Please note that corrective action is due no later than June 4, 2020. Please contact Bekah McLeod at bekah.mcleod@azed.gov or 602-364-1335 with any questions or concerns.

To stay on track with NSLP requirements, check out the NSLP at a Glance Calendar & Monthly Checklist on our website at <http://www.azed.gov/hns/nslp/>.

Training: In-person classes, Web-based training, and How-To guides can be found on ADE's website at

Fiscal Action Assessed?

☒ No- SBP

☐ Yes- SBP

\$6.60

☒ No- NSLP

☐ Yes- NSLP

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by June 4, 2020 to Bekah McLeod at bekah.mcleod@azed.gov.



4/29/2020

Reviewer Signature

Date

If you disagree with any finding that affects the claim for reimbursement, you may appeal the decision by following the National School Lunch Program Administrative Review Appeal Procedures found here:

<https://cms.azed.gov/home/GetDocumentFile?id=58dbe2581130c01500d4b08b>

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